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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:22-cr-00081-MO

Plaintiff,

DEFENDANT'S SENTENCING MEMORANDUM

v.

DENNIS DOYLE,

Defendant.

Dennis Doyle will appear before this Court on January 24, 2023, for sentencing on one count of possession of child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2). Under the terms of the plea agreement, the government will seek a prison sentence of one year and one day. However, the defense will ask this Court to impose one year of home confinement as a condition of probation instead, because this case falls far outside the norm.

In light of a variety of circumstances that will be provided to this Court confidentially, a non-custodial sentence is sufficient, but not greater than necessary, to serve the purpose of punishment.

Page 1 DEFENDANT'S SENTENCING MEMORANDUM

Respectfully submitted this 18th day of January, 2023.

/s/ Elizabeth G. Daily
Elizabeth G. Daily Attorney for Defendant